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15 Attorneys for PLAINTIFF  
ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an  
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,  
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**JOINT STIPULATION RE:  
DEFENDANT'S DEPOSITION  
DATES AND MEDIATION  
DEADLINE**

*[[Proposed] Order filed and served  
concurrently herewith]*

Judge: Hon. Stephen V. Wilson  
Ctrm. 10A

**JOINT STIPULATION**

Plaintiff Robert Hunter Biden (“Plaintiff”) and Defendant Patrick M. Byrne (“Defendant”) (collectively the “Parties”), hereby stipulate as follows:

WHEREAS, in the Court’s November 25, 2024 Order (Dkt. No. 158), the Court ordered the deposition of Defendant to occur within two weeks of the November 25 hearing date. However, on the record, the Court ordered the Parties to conduct Defendant’s deposition within three weeks of the November 25 hearing date (*see* Dkt. No. 161, at 13:22-23);

WHEREAS, it is the mutual understanding of the Parties that the Court’s Order was to conduct Defendant’s deposition within three weeks of the November 25 hearing date;

WHEREAS, the Parties have agreed to conduct Defendant’s deposition via videoconferencing on Friday December 13, 2024, to begin at 9:30 A.M. EST and to continue for three and a half hours of real time. Then, on December 14, 2024, the deposition will resume at 9:30 A.M. EST and will continue for an additional three and a half hours of real time. If any additional time is needed to complete the seven (7) hours of deposition testimony that Plaintiff is entitled to under Federal Rule of Civil Procedure 30, the Parties have agreed to complete Defendant’s deposition on Sunday, December 15, 2024, commencing at 9:30 A.M. EST;

FURTHERMORE, on November 19, 2024, the Court ordered that the mediation in this case occur by December 9, 2024 (*see* Dkt. No. 138);

WHEREAS, subsequent to the Court’s November 19, 2024 Order (Dkt. No. 138), the Court continued trial to March 4, 2025, and the Parties agreed to conduct Defendant’s deposition after December 9, 2024;

WHEREAS, the Parties agree that for the mediation to be productive, the deposition of Defendant on December 13-15, 2024, should precede any such mediation.

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1       **NOW THEREFORE**, it is hereby stipulated and agreed by and between the  
2 Parties, by and through their respective counsel of record, that:

3       1. Defendant's deposition must occur within three (3) weeks of the  
4 November 25, 2024 hearing date; and

5       2. The deadline to complete the Court-ordered mediation before a neutral  
6 from the Court's ADR Panel is continued until January 31, 2025.

7 Dated: December 5, 2024

EARLY SULLIVAN WRIGHT  
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10 By: /s/ Zachary C. Hansen

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28 *Attorney for Plaintiff*  
*Robert Hunter Biden*

1 Dated: December 5, 2024

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5 Michael C. Murphy, Esq.

6 Michael C. Murphy, Jr., Esq.

7 *Attorneys for Defendant*

8 *Patrick Byrne*

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**CERTIFICATE OF SERVICE**

I, Robie Ann Atienza-Jones, hereby certify that on this 5th day of December, 2024, a copy of the foregoing **JOINT STIPULATION RE: DEFENDANT'S DEPOSITION DATES AND MEDIATION DEADLINE** was served via email, on the following:

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